

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

|                                 |   |                         |
|---------------------------------|---|-------------------------|
|                                 | X |                         |
|                                 | : |                         |
| In re:                          | : | Case No. 19-34574 (KRH) |
|                                 | : |                         |
| LeClairRyan, PLLC, <sup>1</sup> | : |                         |
|                                 | : | Chapter 7               |
| Debtor.                         | : |                         |
|                                 | X |                         |

**STIPULATED ORDER EXTENDING BAR DATE TO FILE AN  
ADMINISTRATIVE PROOF OF CLAIM FOR LATHAM & WATKINS LLP**

Lynn L. Tavenner, as the Chapter 7 trustee (the “Trustee”) for the bankruptcy estate of LeClairRyan PLLC, (the “Estate”) the above-captioned debtor (the “Debtor”), and Latham & Watkins LLP (together with the Trustee, the “Parties”), hereby stipulate and agree (this “Stipulated Order”) as follows:

WHEREAS, on September 3, 2019, the Debtor filed with this Court a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (as amended, the “Bankruptcy Code”), commencing the above-captioned Chapter 11 case.

WHEREAS, on October 4, 2019, this Court entered the *Order of Conversion of Chapter 11 to Chapter 7* (Docket No. 140), converting the Debtor’s case to a case under Chapter 7 of the Bankruptcy Code. Upon conversion, the Trustee was appointed interim trustee, and no other trustee having been elected at the meeting of creditors, she continues to serve as Trustee.

WHEREAS, on April 27, 2022, after a motion by the Trustee (Docket No. 1250), this Court entered the *Order Setting Bar Date for Filing Chapter 11 Applications for Administrative Claims* (Docket No. 1307), which requires that requests under section 503(a) of the Bankruptcy Code for

---

<sup>1</sup> The principal address of the Debtor as of the petition date was 4405 Cox Road, Glen Allen, Virginia 23060, and the last four digits of the Debtor’s federal tax identification number are 2451.

payment of administrative expenses incurred on or after September 3, 2019 and before October 4, 2019 must be filed on or before May 31, 2022 (the “Chapter 11 Administrative Claims Bar Date”).

WHEREAS, the Parties are in agreement regarding several items involving this Estate and are documenting the same; as such, the Parties have agreed to enter into this Stipulated Order extending the Chapter 11 Administrative Claims Bar Date solely for Latham & Watkins LLP through and including June 30, 2022.

THEREFORE, IT IS STIPULATED AND AGREED AND SHALL BE SO ORDERED:

1. The Chapter 11 Administrative Claims Bar Date shall be extended solely for Latham & Watkins LLP through and including June 30, 2022.
2. This Court shall retain jurisdiction with respect to all matters relating to the interpretation or implementation of this Stipulated Order.

ENTERED:  
Richmond, Virginia

\_\_\_\_\_  
UNITED STATES BANKRUPTCY JUDGE

STIPULATED AND AGREED:

LATHAM AND WATKINS LLP

By: /s/ James Donaldson  
James K. Donaldson, Esq. (VSB No. 80307)  
*Counsel to Latham & Watkins LLP*

LYNN L. TAVENNER, CHAPTER 7  
TRUSTEE

By: /s/ Paula Beran  
Paula S. Beran, Esq. (VSB No. 34679)  
*Counsel to Lynn L. Tavenner, Chapter 7  
Trustee*

**LOCAL RULE 9022-1(C) CERTIFICATION OF COUNSEL**

Pursuant to Local Rule 9022-1(C), I hereby certify that the foregoing proposed order has been endorsed by or served on all necessary parties.

/s/ James Donaldson  
James K. Donaldson, Esq.

**Service List**

Paula S. Beran, Esq.  
Tavenner & Beran, PLC  
20 North Eighth Street, Second Floor  
Richmond, Virginia 23219

James K. Donaldson, Esq. (VSB No. 80307)  
LimNexus LLP  
919 East Main Street, Suite 1000  
Richmond, VA 23219